

hunter communications law group

ORIGINAL

EX PARTE OR LATE FILED

February 18, 1998

RECEIVED

ORIGINAL

FEB 18 1998

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: CC Docket Nos. 97-208, 97-146, 96-262, 96-128,
96-98, 96-61, 96-45, 94-149, 94-54 and File No. WTB/POL 97-1**

Dear Ms. Salas:

On February 17, 1998, the undersigned, accompanied by Ernest B. Kelly, III, President, and David Gusky, Vice President, respectively, of the Telecommunications Resellers Association ("TRA") met with Chairman William E. Kennard, Ari Q. Fitzgerald, Legal Advisor to the Chairman and Steve Weingarten, Senior Legal Advisor, Wireless Telecommunications Bureau. Discussed at that meeting were TRA's positions in the above-referenced dockets as per the attachment.

Respectfully submitted,



Charles C. Hunter
General Counsel to the
Telecommunications Resellers Association

No. of Copies rec'd
List ABOVE

0+17

1620 I Street, N.W.
Suite 701
Washington, D.C. 20006
Telephone (202) 293-2500
Facsimile (202) 293-2571



**Telecommunications
Resellers
Association**

1730 K Street, N.W.
Suite 1201
Washington, D.C. 20006

Tel: (202) 835-9898
Fax: (202) 835-9893

ISSUES OF KEY CONCERN TO SMALL TO MID-SIZED COMPETITIVE CARRIERS

● BOC Entry Into the "In-region," InterLATA Market

- Ensure that Local Markets are Fully and Irreversibly Open to Competition
- Consider Pricing of Unbundled Network Elements and Wholesale Services, and Availability of Existing Combinations of Unbundled Network Elements
- Require Strict 14-Point "Competitive Checklist" Compliance
- Avoid Relaxation of "Track A"/"Track B" Thresholds

● Access Charge Reform

- Reduce Multi-line Business Preferred Interexchange Carrier Charge
- Reinstate "Unitary" Option for Purchasing Tandem-Switched Transport
- Eliminate Increase in Tandem Switching Charge
- Drive Interstate Switched Access Charges to the Forward-Looking Economic Cost of Call Origination/Termination
- Require Pass-Through of Access Charge Savings to Non-Facilities-Based Carriers

● Entry Into Local Telecommunications Markets

- Eliminate Restrictions on Resale of Contract Service Arrangements, Voice Messaging and Other Competitively Essential Services
- Mandate Commercially Viable Operations Support Systems
- Impose Meaningful Performance Standards on Incumbent LECs

● Resale of Wireless Services

- Eliminate "Sunsetting" of Wireless Resale Requirements
- Require Switch-to-Switch Interconnection
- Mandate Compliance by PCS Licensees with Resale Requirements

● **Universal Service Support Mechanisms**

- Reclassify Universal Service Contributions as Mandatory End-User Surcharges
- Retain Eligibility of Non-Facilities-Based Carriers for Universal Service Support
- Rationalize Levels of Universal Service Support Contributions

● **Mandatory Detariffing**

- Substitute "Permissive Detariffing" for "Mandatory Detariffing"
- Require Public Availability of All Rates and Service Terms and Conditions

● **"Per Call" Payphone Compensation**

- Decouple Non-Coin Payphone Compensation from the Local Coin Rate
- Base "Per Call" Compensation on the Forward-Looking Economic Cost of Completing Payphone-Originated Calls
- Ensure Availability of Payphone-Specific Coding Digits
- Eliminate Interim Payphone Compensation Obligations

● **Unauthorized Carrier Changes**

- Adopt National Safeguards Against "Slamming"
- Avoid Requirements that Invite Consumer Fraud
- Implement Safeguards to Protect Against Abuses of the Carrier Change and "PIC-Freeze" Processes

● **International Call-Back Service**

- Prevent Use of FCC Complaint Process by Foreign Carriers to Insulate Their Home Markets from Competition

● **Voice Telephony Over the Internet**

- Ensure technologically-neutral regulation